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IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

NATHAN CHARLES GRIGGS)

Plaintiff)

v.)

JOHN D. PAYNE, et al.)

Defendants)

DOCKET 1:CV-00-2219

FILED
HARRISBURG
APR 30 2001
MARY E. D'ANDREA, CLERK
Per. DEPUTY CLERK

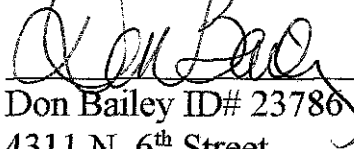
MOTION FOR AN ENLARGEMENT OF TIME

- 1.) On or about December 20, 2001, plaintiff filed this complaint Pro Se and In Forma Pauperis.
- 2.) On April 16 2001, defendants attorney, Frank Lavery filed a Motion to Dismiss Pursuant to Rule 12 (b) (6) of the Federal Rules of Civil Procedure in the above referenced matter.
- 3.) On or about April 20, 2001, plaintiff sent a copy of his complaint and documents to Mr. Bailey's office and requested that Mr. Bailey represent him.
- 4.) I have entered my appearance on behalf of plaintiff on April 30, 2001.
- 5.) Counsel is requesting a 60-day enlargement of time in the above captioned matter to allow counsel to thoroughly investigate and, to respond to the Defendants' Motion to Dismiss.

6.) Opposing counsel only concurs with a 30-day enlargement of time.

WHEREFORE counsel is requesting a 60-day enlargement of time and to advance the case management plan accordingly.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Don Bailey", is written over a horizontal line.

Don Bailey ID# 23786
4311 N. 6th Street
Harrisburg, PA 17110
(717) 221-9500

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CERTIFICATE OF SERVICE

I hereby certify that on this **30th DAY OF APRIL 2001**, a true and correct copy of the foregoing **ENTRY OF APPEARANCE** was served upon the following counsel of record by United States Mail, postage prepaid:

Frank Lavery Jr., Esquire
301 Market Street
Harrisburg, PA 17101

BY: 

Don Bailey ID# 23786
4311 N. 6th Street
Harrisburg, PA 17110
(717) 221-9500